

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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HECTOR CORDERO,

Plaintiff,

-against-

NOTICE OF MOTION

15-CV-3436 (JBW)(CLP)

CITY OF NEW YORK; Police Officer HUGO HUGASIAN, Shield No. 10228; Lieutenant CHRISTOPHER MORAN, Police Officer PAUL PALMINTERI, Shield No. 18460; Police Officer MARCO ARTALE, Shield No. 25158; Police Officer PETER RUBIN, Shield No. 00934; Police Officer JOHN ESSIG, Shield No. 08667; Police Officer LYNETTE REYES, Shield No. 26626; Police Officer RAUL NAREA, shield No. 07493; JOHN and JANE DOE 1 through 10, individually and in their official capacities (the names John and Jane Doe being fictitious, as the true names are presently unknown),

Defendants.
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PLEASE TAKE NOTICE that upon the annexed Local Civil Rule 56.1 Statement, dated August 3, 2017; the Declaration of Amatullah Booth, dated August 3, 2017, and the exhibits annexed thereto; the accompanying Memorandum of Law; and upon all prior pleadings and proceedings had herein, Defendants City of New York, Hugo Hugasian, Christopher Moran, Peter Rubin and John Essig will move this Court on August 4, 2017, for partial summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure on the grounds that there are no material issues of fact in dispute that warrant a trial with respect to certain claims and Defendants, and that Defendants are entitled to judgment as a matter of law, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, shall be served on or before August 18, 2017.

PLEASE TAKE FURTHER NOTICE that reply papers, if any, shall be served on or before September 1, 2017.

Dated: New York, New York
August 3, 2017

ZACHARY W. CARTER
Corporation Counsel of the City of New York
*Attorney for Defendants City of New York, Hugo
Hugasian, Christopher Moran, Peter Rubin and
John Essig*
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New York, New York 10007
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By: _____ /s/
Amatullah Booth
Senior Counsel
Special Federal Litigation Division

TO: Gabriel Harvis, Esq. (By First Class Mail and ECF)
Harvis & Fett
Attorneys for plaintiff
305 Broadway, 14th Floor
New York, New York 10007

cc: Honorable Jack B. Weinstein (By Hand Delivery and ECF)
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201